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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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SEP 19 2011

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2011 SEP 19 P 4:09

AZ CORP COMMISSION  
DOCKET CONTROL

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IN THE MATTER OF THE PROPOSED  
AMENDMENTS TO THE PIPELINE SAFETY  
RULES R14-5-201, R14-5-202, R14-5-203, R14-  
5-204 AND R14-5-205.

DOCKET NO. RG-00000A-11-0161

COMMENTS OF UNS GAS, INC.

UNS Gas, Inc. ("UNS Gas"), through undersigned counsel, submits comments to the proposed changes to the Arizona Corporation Commission's pipeline safety rules, codified at Arizona Administrative Code R14-5-201 through R14-2-205. UNS Gas owns, operates, and maintains approximately 59 miles of intrastate natural gas transmission pipelines and approximately 4,183 miles of intrastate distribution mains and services within the State of Arizona. UNS Gas is therefore an interested party to this proceeding.

UNS Gas supports updating the Arizona pipeline safety regulations that recognize the amendments to the federal pipeline safety regulations codified at 49 CFR Parts 191, 192, 193, 195, and 199, revised as of October 1, 2010. UNS Gas recommends that the Commission adopt the proposed amendments to the pipeline safety rules as detailed in the Utilities Division Staff's memorandum dated July 28, 2011 filed in this docket.

RESPECTFULLY SUBMITTED this 19<sup>th</sup> day of September 2011.

UNS Gas, Inc.

By

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Original and 13 copies of the foregoing  
filed this 19<sup>th</sup> day of September, 2011, with:

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
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Copy of the foregoing hand-delivered/mailed  
this 19<sup>th</sup> day of September, 2011, to:

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